

1 **1**
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8 **Attorney for Debtors**

9
10 **UNITED STATES BANKRUPTCY COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 **In Re:**

Case No:10-21598-A-7
DC No. EJS-1

13 **DAVEY, MIKE**

MOTION TO COMPEL
ABANDONMENT OF
PROPERTY OF THE ESTATE
11 USC 554

14 **_____ Debtors _____/**

Date: March 1, 2010
Time: 9:00 a.m.
Judge: MCMANUS
Dept: A, Rm 28, 7th Flr.

15 Debtor moves the Court as follows:

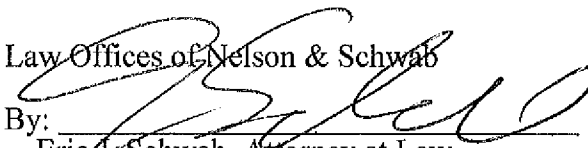
- 16 1. Debtor is self employed doing business as Olympic Cleaning Service, a sole
17 proprietor, performing cleaning services.
18 2. Debtor Scheduled business assets and claimed them exempt.
19 3. Debtor's business activities are licensed and insured.
20 4. More details are provided by Debtor's Declaration and Exhibits Thereto.
21 5. Debtor's business is burdensome to the estate and his business assets are of
22 inconsequential value and benefit to the estate.

23 **Wherefore, Debtor(s) Pray:**

- 24 1. That the Court compel the Trustee to abandon Debtor's business and business
25 assets from the bankruptcy estate.
26 2. For other relief the Court deems just and proper.

27 Dated: 1/29/10

28 Law Offices of Nelson & Schwab

By: 
Eric J. Schwab, Attorney at Law